

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

JUSTINA CHAPPELL, as Administrator of  
the Estate of Delyle Walter Chappell,

Plaintiff

v.

PRECISION DRILLING CORPORATION,  
PRECISION DRILLING COMPANY, LP,  
CABOT OIL & GAS CORPORATION,  
COTERRA ENERGY, INC., FORUM  
ENERGY TECHNOLOGIES, INC. and  
FORUM ENERGY SERVICES, INC.,

Defendants

**CIVIL ACTION  
NO. 3:23-cv-00604-RDM**

**STIPULATION TO STRIKE ALLEGATIONS OF RECKLESSNESS AND PUNITIVE  
DAMAGES**

It is hereby stipulated, by and between the undersigned counsel, that all allegations of recklessness and punitive damages in Plaintiffs' Complaint are hereby stricken, without prejudice. Should discovery reveal reckless conduct and/or that punitive damages are warranted, nothing in this Stipulation shall preclude plaintiff from moving this Honorable Court for reinstatement of the same.

**SALTZ MONGELUZZI & BENDESKY,  
P.C.**

**ZARWIN, BAUM, DEVITO, KAPLAN,  
SCHAER, TODDY, P.C.**

/s/ Michael A. Budner, Esq.  
Michael A. Budner, Esquire  
Attorney for Plaintiffs

Date: 7/26/2023

/s/ Christopher G. Mavros, Esq.  
Christopher G. Mavros, Esquire  
Attorney for Defendants, Forum Energy  
Technologies, Inc. and Forum Energy  
Services, Inc.

Date: 7/26/2023